

# **EXHIBIT C**



**JOSEPH WHITEMORE**

**June 1, 2006**

Page 1

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

C.A. NO. 04-11842-PBS

\* \* \* \* \*

SCOTT RODGERS,

Plaintiff

vs.

CORRECTION OFFICER ORCHID,

UNKNOWN CORRECTION OFFICER JOHN

DOE, JOE WHITMORE, DR. HOWARD,

JOHN SMITH, PLYMOUTH COUNTY,

Defendants

\* \* \* \* \*

DEPOSITION OF JOSEPH A. WHITEMORE

HRONES, GARRITY & HEDGES

Lewis Wharf Bay, Suite 232

Boston, Massachusetts

June 1, 2006 11:15 a.m.

Maryellen Coughlin

Registered Professional Reporter

**CATUOGNO COURT REPORTING SERVICES**

**Springfield, MA Worcester, MA Boston, MA Lawrence, MA Providence, RI**

**JOSEPH WHITEMORE**

**June 1, 2006**

Page 47

1           Q.       When we were talking about medicine  
2 log, that's synonymous with the book that you're  
3 talking about right now?

4           A.       Medication log.

5           Q.       Is there -- let's put it this way,  
6 is there any other document besides that book  
7 that would reflect what medicine was given to  
8 what inmate on what day?

9           A.       No.

10          Q.       Okay. So that's the only one?

11          A.       Right, yes.

12          Q.       Tell me what happened around the  
13 time that you called the ambulance for Scott  
14 Rodgers?

15          A.       He came down to medical. He was  
16 pale. He was cramping. Visually he looked  
17 uncomfortable. I did a set of vital signs on  
18 him, blood pressure, pulse, respirations, that  
19 sort of thing, and his vital signs were  
20 concerning, a low blood pressure and a high  
21 pulse. So I thought he might have a G.I. bleed  
22 or an ulcer, you know, and so I sent him over to  
23 the hospital.

24          Q.       How did he get into the medical

**CATUOGNO COURT REPORTING SERVICES**

**Springfield, MA Worcester, MA Boston, MA Lawrence, MA Providence, RI**

**JOSEPH WHITEMORE**

**June 1, 2006**

Page 48

1       **unit?**

2           A.       He walked in.

3           **Q.       Who had sent him over there?**

4           MR. BREEN:  Objection.

5           A.       The officer in that unit.  I don't  
6 know who it was.  I mean, generally they don't  
7 just send people down.  They will call us and --

8           **Q.       What did the officer tell you?**

9           MR. BREEN:  Objection.

10          A.       I can't recall.  He must have said  
11 something like, "Scott Rodgers is throwing up,  
12 doesn't feel good, can he be seen?"

13          **Q.       Who is Officer Murray?**

14          A.       Ben Murray, he's an officer at the  
15 jail.

16          **Q.       Was that the one who called you**  
17 **that day?**

18          A.       I can't recall.  I don't know.

19          **Q.       What did Scott Rodgers say when he**  
20 **walked into the medical unit?**

21          A.       I don't remember.

22          **Q.       Could he walk?**

23          A.       Yes.

24          **Q.       Did he collapse?**

**CATUOGNO COURT REPORTING SERVICES**

**Springfield, MA  Worcester, MA  Boston, MA  Lawrence, MA  Providence, RI**

**JOSEPH WHITEMORE**

**June 1, 2006**

Page 49

1           A.           He sat down pretty heavily on the  
2 bench out there. He was fatigued. He was  
3 uncomfortable.

4           Q.           Was he able to speak at all?

5           A.           Yeah.

6           Q.           But you don't remember what he  
7 said?

8           A.           Not specifically, no. "I don't  
9 feel good," you know.

10          Q.           And he hadn't presented with these  
11 symptoms that morning?

12          A.           No.

13          Q.           What did he look like in the  
14 morning?

15          A.           Okay.

16          Q.           What do you mean?

17          A.           He looked okay. He looked healthy.  
18 He didn't look like he did later that day. Later  
19 that day, when he came down into medical, he  
20 looked pale and sweaty and sick, uncomfortable.  
21 In the morning, you know there was no -- he  
22 didn't look that way. He looked okay.

23          Q.           Who else was there in the medical  
24 unit?

**CATUOGNO COURT REPORTING SERVICES**

**Springfield, MA Worcester, MA Boston, MA Lawrence, MA Providence, RI**